

Federal Defenders OF NEW YORK, INC.

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May 5, 2021

BY ECF

The Honorable Judge Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**RE: United States v. Desirae Schneider
20 Cr. 325 (SHS)**

Dear Judge Stein:

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to drive to Florida from Thursday, May 6 through Monday, May 10, 2021 to participate in a mission with a church for elderly women who would otherwise be alone on Mother's Day. Pretrial services and the Government take no position on this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On April 12, 2021, Ms. Schneider pled guilty to the one-count indictment. She has remained out on bond and spoke with the Department of Probation today for her presentence interview at the courthouse. Ms. Schneider's sentencing is currently scheduled for June 30, 2021.

Since Ms. Schneider's release, she has made a series of requests for temporary bail modifications permitting her to travel out of the district (primarily to Astoria, Queens, only 15

minutes away from her home) with no objection from pretrial services or the Government. For the past year, she has remained in constant compliance with the conditions of her release.

Ms. Schneider now respectfully requests a temporary bail modification to allow Ms. Schneider to drive to Florida from Thursday, May 6 through Monday, May 10, 2021 to participate in a mission with a church for elderly women who would otherwise be alone on Mother's Day. Pretrial services and the Government take no position on this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Marne Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:



HONORABLE SIDNEY H. STEIN
United States District Judge

Dated: New York, New York
May 5, 2021

cc: Rebecca Dell, Assistant U.S. Attorney
 Jonathan Lettieri, Pretrial Services Officer